

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Tampa Electric Company's Petition) Docket No. 992014-EI
For approval of its plan to bring its) Filed: January 21, 2000
Generating units into compliance with)
The Clean Air Act.)

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION INC.
PETITION FOR LEAVE TO INTERVENE

Legal Environmental Assistance Foundation, Inc. (LEAF), pursuant to rule 28-106.205, Florida Administrative Code (FAC), petitions to intervene in the above-captioned docket and states:

1. LEAF is located at 1114 Thomasville Road, Suite E, Tallahassee, Florida 32303.

2. Persons to be served with copies of documents in this docket are:

Gail Kamaras/Debra Swim
Legal Environmental Assistance Fdn.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303

3. The Commission's determination in this proceeding will significantly affect air quality in the airshed surrounding Tampa Electric Company's facilities, as well as water quality and human health.

4. LEAF is a public interest advocacy organization with substantial interests that

- AFA 5
APP
CAF
CNU
CTR
LEG 2
MAG 5
OPC
RRR
SUC 1
VAV
OTH

will be affected by the Commission's action in this docket. The corporate purposes of LEAF include ensuring environmental and health benefits for its members and the

RECEIVED & FILED

Handwritten signature and stamp: EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

99050 JAN 21 08

EPSC-RECORDS/REPORTING

Done 1/27/00

public. A substantial number of LEAF's members use and enjoy natural resources (including clean air) whose quality is placed at risk from pollution from electric generating facilities, including from the Gannon and Big Bend power plants.

5. Petitioner disputes, inter alia, the fairness, justness and reasonableness of Tampa Electric's Comprehensive Clean Air Act Compliance Plan, its request for approval of the types of costs included in that plan for Environmental Cost Recovery and the timing of its request in that pending federal legal enforcement action has not been resolved.

6. Petitioner is entitled to relief under Chapters 120, 366 and 403, Florida Statutes and implementing regulations. Petitioner reserves the right to rely on additional statutes or rules should additional issues arise or become known.

WHEREFORE, Petitioner requests permission to intervene in this docket and be granted full rights to participate in all proceedings therein.

Respectfully submitted,

Gail Kamaras
Legal Environmental Assistance Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, Fl 32303-6290
(850) 681-2591; gkamaras@lewisweb.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Legal Environmental Assistance Foundation, Inc. (LEAF) Petition for Leave to Intervene has been furnished by hand delivery (*) or by U.S. Mail to the following parties of record on January 21, 2000.

Grace Jaye
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Lee Willis/James Beasley
Ausley Law Firm
PO Box 391
Tallahassee, FL 32302

Ms. Angela Llewellyn
Regulatory Affairs
Tampa Electric Co.
PO Box 111
Tampa, FL 33601-0111

Jack Shreve
Office of Public Counsel
111 W. Madison St., Suite 812
Tallahassee, FL 32399-1400

Vicki Gordon Kaufman
McWhirter Reeves
117 S. Gadsden St
Tallahassee, FL 32301

John McWhirter
McWhirter Reeves
PO Box 3350
Tampa, FL 33601-3350



Gail Kamaras
Legal Environmental Assistance
Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303